

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

JOE ANDREW SALAZAR,

Plaintiff,

v.

AT&T MOBILITY LLC,  
SPRINT/UNITED MANAGEMENT  
COMPANY,  
T-MOBILE USA, INC., and  
CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS,

Defendants.

Civil Action No. 5:19-cv-75

**JURY TRIAL DEMANDED**

**JOINT MOTION FOR ENTRY OF DISCOVERY ORDER**

Pursuant to the Court's Order (Dkt. 34), Plaintiff Joe Andrew Salazar ("Salazar") and Defendants AT&T Mobility LLC, Sprint/United Management Company, T-Mobile USA, Inc., And Cellco Partnership a/b/a Verizon Wireless ("Defendants"), (collectively, the "Parties"), submit their attached Discovery Order for the Court's consideration. The proposed Discovery Order is agreed to, with the exception of a request by Plaintiff to use materials produced in *Salazar v. HTC Corporation*, 2:16-cv-01096-JRG (E.D.Tex.). Defendants oppose Plaintiff's request for the reasons stated in the proposed Discovery Order.

Dated: October 31, 2019

Respectfully submitted,

/s/ Daruish Keyhani

Geoffrey Culbertson

TX Bar No. 24045732

[gpc@texarkanalaw.com](mailto:gpc@texarkanalaw.com)

Kelley Tidwell

TX Bar No. 20020580

[kbt@texarkanalaw.com](mailto:kbt@texarkanalaw.com)

PATTON, TIDWELL & CULBERTSON, LLP

2800 Texas Boulevard

Texarkana, Texas 75503

Telephone: 903-792-7080

Fax: 903-792-8233

Daruish Keyhani (Lead Attorney)

District of Columbia Bar No. 1031500

*(pro hac vice)*

Frances H. Stephenson

New York registration No. 5206495

*(pro hac vice)*

Keyhani LLC

1050 30th Street NW

Washington, DC 20007

Telephone: (202) 748-8950

Fax: (202) 318-8958

[dkeyhani@keyhanillc.com](mailto:dkeyhani@keyhanillc.com)

[fhstephenson@keyhanillc.com](mailto:fhstephenson@keyhanillc.com)

*Attorneys for Plaintiff*

*/s/ Fred I. Williams*

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Fred I. Williams  
Texas Bar No. 00794855  
fwilliams@velaw.com  
VINSON & ELKINS LLP  
2801 Via Fortuna, Suite 100  
Austin, Texas 78701  
Tel: 512.542.8400  
Fax: 512.542.8610

Todd E. Landis  
Texas Bar No. 24030226  
tlandis@velaw.com  
VINSON & ELKINS LLP  
2001 Ross Avenue, Suite 3700  
Dallas, TX 75201  
Tel: 214.220.7700  
Fax: 214.220.7716

Parker Hancock  
Texas Bar No. 24108256  
phancock@velaw.com  
VINSON & ELKINS LLP  
1001 Fannin Street, Suite 2500  
Houston, TX 77002-6760  
Tel: 713.758.2222  
Fax: 713.758.2346

Harry Lee Gillam, Jr.  
State Bar No. 07921800  
gil@gillamsmithlaw.com  
GILLAM & SMITH, LLP  
303 South Washington Avenue  
Marshall, Texas 75670  
Tel: 903.934.8450  
Fax: 903.934.9257

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 31st day of October, 2019, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Fred I. Williams